

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

NSC Investment, LLC and TGC/Korea Operating,  
LLC

Plaintiffs,

-v-

POSCO Engineering & Construction Co., Ltd.,

Defendant.

Civil Action No. 19-CV-02498 (JGK)

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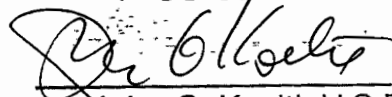
**PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR LEAVE TO FILE  
EXHIBIT 4 TO THE DECLARATION OF TATIANA SAINATI UNDER SEAL**

Plaintiffs NSC Investment, LLC and TGC/Korea Operating, LLC (collectively, "Gale"), respectfully move this Court for leave to file Exhibit 4 to the Declaration of Tatiana Sainati under seal in the above-captioned case.

Exhibit 4 contains confidential information that is not available to the public. Specifically, Exhibit 4 is Defendant POSCO Engineering & Construction Co., Ltd.'s Answer and Counterclaim under the Rules of the International Chamber of Commerce ("ICC"). The contents of this Answer must be treated as confidential until the parties have the opportunity to establish rules governing the confidentiality of the arbitration proceedings before the ICC tribunal. Gale expects that, consistent with frequent practice in the international arbitration context, the parties will agree to keep at least certain aspects of the arbitral proceedings confidential, including this Answer.

WHEREFORE, Gale respectfully requests that this Motion be granted, and that Exhibit 4 to the Declaration of Tatiana Sainati be filed under seal.

**APPLICATION GRANTED  
SO ORDERED**

11/20/19   
John G. Koeltl, U.S.D.J.

November 18, 2019

Respectfully submitted,

/s/ Rebecca Fiebig  
Rebecca Fiebig (Bar No. RP1982)  
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*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that, on November 18, 2019, a true and correct copy of the foregoing was filed and served electronically through the Court's CM/ECF system.

/s/ Rebecca Fiebig  
Rebecca Fiebig